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April 30, 2004

United States Environmental Protection Agency
Office of Pollution Prevention and Toxics
ATTN: Charles M. Auer, Director
Washington, D.C. 20460

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Dear Mr. Auer:

I am writing in response to your April 12, 2004 correspondence with our company. The original commitment (December 1999) to participate in the HPV Challenge Program was made by previous owners, Marsulex Inc./Toronto Ontario (a large North American Chemical Company). The ownership of our company has undergone significant change.

The operations, located here in Copperhill, Tennessee, were sold to local management January 1, 2001. We are now operating as a small chemical business with less than 50 employees and we lack the financial resources to undertake the testing and studies associated with the HPV Challenge Program. We are therefore respectfully withdrawing our sponsorship for benzene sulfonic acid, 4-methyl (CAS # 104-15-4) in the program.

Should future testing or studies on this product be required by EPA, we will of course support our fair share of the costs along with the other producers and importers of this product.

Sincerely,

John M. Petty
Plant/Environmental Manager
423-496-1353